

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAW STORY MEDIA, INC.,
ALTERNET MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC,
OPENAI, LLC, OPENAI OP CO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:24-cv-01514-CM

[PROPOSED] STIPULATED
PROTECTIVE ORDER

MEMO ENDORSED

9/23/2024
This order does
not include
the mandatory

language found in
my Local Rules,
without which I will
not sign any
protective order



USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 9/23/24
--